## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

| FREDERICK J. GREDE, not individually but as     |                                |
|-------------------------------------------------|--------------------------------|
| Liquidation Trustee of the Sentinel Liquidation |                                |
| Trust,                                          |                                |
|                                                 | Honorable Rebecca R. Pallmeyer |
| Plaintiff,                                      |                                |
| v.                                              |                                |
|                                                 | ) Case No. 09-cv-00120         |
| FARR FINANCIAL, INC.,                           | )                              |
|                                                 | )                              |
| Defendant.                                      | )                              |

## FARR FINANCIAL, INC.'S MOTION FOR ENTRY OF JUDGMENT ON COUNTS I THROUGH V OF THE TRUSTEE'S SECOND AMENDED COMPLAINT

Defendant, Farr Financial, Inc. ("Farr"), respectfully submits this Motion for Entry of Judgment on Counts I through V of the Trustee's Second Amended Complaint. Specifically, Farr seeks an Order from the Court: (1) entering judgment in Farr's favor and against the Trustee on Counts I through V of the Trustee's Second Amended Complaint; (2) directing the Trustee to pay Farr its pro rata share of the SEG 1 Reserve, the Section 7.20(b) Disputed Claims Reserve, and the SEG 3/4 Reserve within seven days of this Court's entry of judgment on Count III; and (3) granting all other just relief.

A Memorandum of Law has been submitted herewith.

Accordingly, in view of the arguments in the accompanying memorandum, Farr respectfully requests that the Court GRANT its Motion for Entry of Judgment on Counts I through V of the Trustee's Second Amended Complaint.

Dated: October 16, 2017 Respectfully submitted,

FARR FINANCIAL, INC.

By: <u>/s/ Henry K. Becker</u>
Its Attorney

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## **CERTIFICATE OF SERVICE**

I, Henry K. Becker, hereby certify that on October 16, 2017, I electronically filed the foregoing FARR FINANCIAL, INC.'S MOTION FOR ENTRY OF JUDGMENT ON COUNTS I, II, IV and V with the Clerk of the Court using the CM/ECF system, which caused the same to be served on all counsel of record via ECF filing.

By: /s/ Henry K. Becker